## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
W. R. GRACE & CO., et al.	)	Case No. 01-01139 (JKF)
Debtors.	)	(Jointly Administered)  Re: Docket No. 6301, 6371, 6654, 6852, 6853, 12819, and 12921  Hrg date: August 21, 2006, 2:00 p.m.

## DEBTORS' MOTION FOR LEAVE TO FILE A REPLY IN SUPPORT OF THEIR OBJECTION TO DAVID SLAUGHTER'S CLAIM

The Debtors request leave to file a reply to clarify misstatements of fact and law that are made in *Creditor David Slaughter's Response to Debtors' Objection to David Slaughter's Claim* (No. 5703) [Dkt. No. 12921].

Mr. Slaughter's response makes several misstatements of fact and law with respect to his pending claim, as well as the process surrounding the denial of Mr. Slaughter's motion for leave from the Debtors' automatic stay. Most notably, Mr. Slaughter's response (i) misstates Mr. Slaughter's burdens of proof of persuasion with respect to his claim; (ii) misstates the Court's directives to the Debtors with respect resolving Mr. Slaughter's claim; and (iii) improperly assumes that the Debtors could not submit Mr. Slaughter's claim to the Debtors' ADR program, should the Court deny the Debtors' objection.

Therefore, the Debtors ask the Court for leave to file a five-page Reply in Further Support of the Debtors' Objection to David Slaughter's Claim (No. 5703) (attached as <u>Exhibit</u> <u>A</u>).

Wilmington, Delaware Dated: August 11, 2006

Respectfully submitted,

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and

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